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 GEOVECTOR CORPORATION
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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION
 11

12 **GEOVECTOR CORPORATION**, a California
 corporation,
 13

14 Plaintiff;

15 v.

16 **SAMSUNG INTERNATIONAL, INC.**, a New
 Jersey corporation;
 17 **SAMSUNG ELECTRONICS CO., LTD.**, a
 Korean corporation;
 18 **SAMSUNG ELECTRONICS AMERICA, INC.**, a
 New York corporation;
 19 **SAMSUNG TELECOMMUNICATIONS**
AMERICA, LLC, a Delaware limited liability
 20 company; and
SAMSUNG RESEARCH AMERICA, INC., a
 21 California corporation.

22 Defendants.
 23

Case No. 4:16-cv-02463-DMR

MODIFIED
 STIPULATION AND ~~PROPOSED~~ ORDER
 EXTENDING TIME TO RESPOND TO
 COMPLAINT

Complaint Filed: May 5, 2016

Before the Hon. Donna M. Ryu

STIPULATION TO EXTEND TIME

This Stipulation is entered into by Plaintiff GeoVector Corporation (originally CritiCom Corporation, hereinafter “GeoVector,” or “Plaintiff,”) and Defendants Samsung Electronics Co., Ltd. (“SEC”), and Samsung Electronics America, Inc. (“SEA”) (collectively, “Samsung,” or “Defendants”) by their respective counsel.¹

RECITALS

1. On May 5, 2016, Plaintiff filed an Original Complaint in the instant action.
2. On May 6, 2016, the Court scheduled the initial case management conference for August 3, 2016.
3. On May 13, 2016, Plaintiff served SEA with the Summons and Original Complaint.
4. On June 7, 2016, Plaintiff filed its First Amended Complaint.
5. Plaintiff agreed to an extension of time for the Defendants to respond to the Complaint by 90 days in exchange for SEC’s agreement to accept or otherwise waive service of the Summons and Complaint such that Defendants’ response to the First Amended Complaint is due on the same date.
6. Civil Local Rule 6-1(a) for the United States District Court for the Northern District of California allows the parties to stipulate, without a court order, to extend the time within which to respond to a complaint, provided that the extension will not alter the dates of any events or deadlines already set by the Court; and
7. Civil Local Rule 6-1(a) requires that any such stipulations be promptly filed with the Court.

¹ The First Amended Complaint also lists Samsung Telecommunications America, LLC (“STA”), Samsung Research America, Inc. (“SRA”), and Samsung International, Inc. (“SII”) as defendants. However, Samsung makes the representation that certain of these parties are improperly listed and should be removed from this case, including STA which merged into SEA prior to the filing of the Original Complaint. Accordingly, Samsung reserves the right to move to dismiss improperly-named parties such as STA at a later date.

STIPULATION

The parties agree that (i) the Case Management Conference should be continued from August 3, 2016 to September 14, 2016, or any other date suitable for the Court that is after the Defendants file their answer, and (ii) the Case Management Statement is due one week prior to the rescheduled Case Management Conference.

The parties also agree that the undersigned Mr. Dan Girdwood hereby accepts service on behalf of all named defendants listed in the First Amended Complaint that has been filed by Plaintiff.²

The parties also agree that all named defendants may have an extension of time through September 2, 2016 to file a response to the First Amended Complaint.

COMPUTERLAW GROUP LLP

Dated: June 10, 2016

By: /s/ Christopher Sargent
Jack Russo
Christopher Sargent

Attorneys for Plaintiff
GEOVECTOR CORPORATION

SAMSUNG ELECTRONICS AMERICA, INC.

Dated: June 10, 2016

By: /s/ Dan Girdwood
Dan Girdwood

On Behalf of Defendants
SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG INTERNATIONAL, INC. and
SAMSUNG RESEARCH AMERICA, INC.

ATTESTATION OF E-FILED SIGNATURE

I, Christopher Sargent, am the ECF user whose ID and password are being used to file this stipulation. In compliance with Civil L. R. 5-1(i)(3), I hereby attest that Dan Girdwood has concurred in the filing's content and has authorized this filing.

/s/ Christopher Sargent

² Mr. Girdwood's acceptance of service is not a representation that any party named in Plaintiff's Original Complaint or First Amended Complaint is a proper party to this dispute.

MODIFIED **ORDER**

The case management conference set for August 3, 2016 is now set for September ²¹~~14~~,
 2016 at 10:00 a.m. in Courtroom 4, 3rd Floor, Oakland before Magistrate Judge Donna M. Ryu
¹⁴
 and the Case Management Statement is due on September ~~7~~, 2016.

Dated: June 13, 2016

